



## **Relay Vermont FCC Certification Renewal Supplemental Information**

July 3, 2018

**ATTN:**

Dana Wilson,  
Federal Communications Commission  
Consumer and Governmental Affairs Bureau  
Disability Rights Office  
445 12th Street, SW  
Washington, DC 20554

**CG DOCKET NO. 03-123**

Dear Ms. Wilson,

Pursuant to the Commission's request, Vermont Relay hereby supplements previously filed TRS recertification application with the enclosed information.

I hereby certify that Vermont Relay is in compliance to the rule sections noted in the Commission's follow up inquiry email.

If there are any questions regarding this filing, please contact me at any time. Thank you for your assistance.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Sunni Eriksen', written over a horizontal line.

Sunni Eriksen  
TRS Administrator, State of Vermont

**64.604(a)(v) Mandatory Minimum Standards**

CAs answering and placing a TTY-based TRS or VRS call shall stay with the call for a minimum of ten minutes. CAs answering and placing an STS call shall stay with the call for a minimum of twenty minutes. The minimum time period shall begin to run when the CA reaches the called party.

*Sprint's Recommendation for State's Response to FCC:*

*Consistent with the new requirement of 64.604(a)(1)(v), Sprint CAs answering or placing a STS call stays with the call for a minimum of twenty minutes.*

**64.606(d) Method of Funding**

Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

*Sprint's Recommendation for State's Response to FCC: Communications promoting understanding of Vermont Relay, such as surcharge on local telephone bill, are labeled in a manner that is respectful and does not offend the public. As such, Vermont Relay in compliance with this requirement.*

**64.604 (c)(2) Contact Persons**

Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

- (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;
- (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and
- (iii) The physical address to which correspondence should be sent.

*Sprint's Guidance for States:*

*Please delete this reference/section (64.604(c)(2)) if it was \*not\* among the follow up inquiries you received from FCC.*

*If your state did receive this as one of FCC's follow up inquiry, please provide in response the current/accurate TRS POC. You should check to verify accuracy of your state's POC at these two FCC websites:*

- <https://www.fcc.gov/general/trs-state-and-territories>
- <https://www.fcc.gov/general/trs-points-contact-complaints>

*Your receipt of this particular follow up inquiry is most likely an indication that the POC provided in your recertification application filing does not match what appears either or both of these two websites; therefore, FCC is attempting to verify which is accurate.*

**64.5105 – 64.5110 TRS Customer Proprietary Network Information**

**Because 64.606(b)(1)(i) requires that state TRS programs establish that they meet or exceed all operational, technical, and functional minimum standards contained in 64.604, and 64.604(d) incorporates by reference the CPNI rules, the states are required to establish that their programs comply with the CPNI rules.**

*Sprint's Guidance for States: As your state's contractor, Sprint files Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") compliance certification with FCC annually as required. See Attachment A.*

*Because the CPNI rules are now part of the TRS mandatory minimum standards, the Commission also needs a compliance certification from the state certifying that your TRS program is in compliance with the CPNI rules. As such, please work with appropriate state official(s) to prepare, sign, and include with your supplemental TRS recertification application filing, a letter to FCC certifying that the state TRS programs complies with the CPNI rules.*

*The purpose of the CPNI rules is to protect consumers' privacy.*

## ATTACHMENT A

### SPRINT'S STATEMENT OF CPNI COMPLIANCE

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Sprint Corporation ("Sprint") complies with the Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") minimum standards with respect to Sprint's role as a contractor supporting Vermont's Telecommunications Relay Service ("TRS") program. However, per 47 C.F.R. §64.606(c)(1), it is Vermont's responsibility to certify Vermont's TRS program every 5 years. The following statement only explains the operating procedures established by Sprint to ensure its compliance with the CPNI rules (see 47 C.F.R. §64.5101 *et seq.*) as a contractor supporting the State TRS program for the current 5-year certification period (calendar years 2013-2017); the statement does not address Vermont's compliance as the Vermont TRS program administrator or the activities of any other contractors that Vermont may use to support the Vermont TRS program. Per the FCC, Vermont has an obligation to provide a CPNI statement to the FCC in accordance with FCC 47 C.F.R. §64.604(d) and 64.606(c)(1).

#### **Data Brokers**

As Vermont's contractor, Sprint did not detect any pretexting activities by data brokers during the certification period.

#### **CPNI Complaints**

As Vermont's contractor, Sprint did not receive any complaints during the certification period concerning the unauthorized release of TRS CPNI.

#### **Use, Disclosure and Access to CPNI**

As Vermont's contractor, Sprint did not use, disclose or permit access to TRS CPNI in 2017 without complying with procedures specified in 47 C.F.R. §64.5101 *et seq.* Sprint did not use, disclose, or permit access to TRS CPNI for marketing purposes or for any other reason not authorized in 47 U.S.C. §64.5105(c).

#### **Safeguards**

As Vermont's contractor, Sprint takes reasonable measures to discover and protect against attempts to gain unauthorized access to TRS CPNI. Consistent with Sprint's commitment to preserving customer privacy, as Vermont's contractor, Sprint has a variety of training programs for its employees and subcontractors. The training explains how Sprint employees and subcontractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. During the certification period, all Sprint employees and all subcontractors who had access to TRS CPNI took CPNI training.

As Vermont's contractor, Sprint also maintains a disciplinary process as part of Sprint's procedures that addresses CPNI compliance. Sprint security personnel investigate instances of potential improper access or disclosure of CPNI by employees. If the investigation indicates a violation has occurred, disciplinary action is taken, up to and including termination.

Before disclosing CPNI to subcontractors, Sprint enters into agreements with strict privacy and confidentiality provisions that require the subcontractor to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews contract terms and conditions to ensure that those provisions adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires subcontractors with which it shares CPNI to safeguard this information in a manner that is consistent with the FCC's rules and retains the right to terminate the contract in the event of a breach.

**Authentication**

Sprint does not currently offer users of the Vermont TRS service telephonic, online, or in-store access to TRS CPNI. Therefore, the authentication requirements in 47 C.F.R. §64.5110 are not applicable at this time with respect to Sprint's role as Vermont's contractor.

**Notification of Account Changes**

Sprint provides notice to Vermont's TRS users in accordance with the FCC's requirements when a triggering event occurs that falls within scope of Sprint's responsibilities.

**Notification of CPNI Breaches**

In accordance with the FCC's rules, Sprint provides notice to law enforcement in the event that a breach of customer information includes CPNI. Sprint also provides notice to impacted customers after completing the process of notifying law enforcement. Such notification provides customers with enough information to understand the nature of the breach, the scope of impacted information and recommendations on how the customer should respond. If the impacted customer alerts Sprint of a potential breach, Sprint investigates the customer's allegations and communicates as necessary with the customer and/or law enforcement. Sprint did not have any breaches of Vermont TRS CPNI during the certification period.